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13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

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17 MARY JEAN HONG,  
18 Plaintiff,  
19 v.  
20 RIGHT MANAGEMENT  
CONSULTANTS, INC., DOES 1 through  
21 100, inclusive,  
22 Defendants.

23 Case No. C04 4011 PJH (EDL)

**DISCOVERY MATTER**

**STIPULATION AND [PROPOSED]  
ORDER RE DISCOVERY MOTION  
DEADLINE WITH REGARD TO  
PLAINTIFF'S DEPOSITION OF JAMES  
GREENWAY**

**WHEREAS** the parties have reached agreement on their dispute concerning certain lines of inquiry about which James Greenway had been instructed not to answer at his December 7, 2005 deposition.

**IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto through their undersigned counsel, that Defendant agrees to produce James Greenway for further deposition via telephone on January 2, 2006, concerning the lines of inquiry agreed to by the parties, and for reasonable follow-up questions thereon. Defendant makes this stipulation without waiving any of its objections to the lines of questioning agreed to by the parties, and without prejudice to any other rights and remedies it has with regard to the proposed line of questioning. The Parties further agree and that Plaintiff's deadline for moving to compel any questions asked in that deposition shall be extended to January 11, 2005, and that Plaintiff may bring any such motion on an expedited basis, in accordance with Civil L.R. 37-1(b).

## **IT IS SO STIPULATED.**

DATED: December 16, 2005 By: \_\_\_\_\_ /s  
PAUL D. HERBERT  
THE LOUDERBACK LAW FIRM  
Attorneys for Plaintiff  
MARY JEAN HONG

DATED: December 15, 2005 By: /s/  
RONALD D. ARENA  
LITTLER MENDELSON, P.C.  
A Professional Corporation  
Attorneys for Defendant  
RIGHT MANAGEMENT  
CONSULTANTS, INC.

## **SO ORDERED.**

DATED: December 16, 2005

Judge Elizabeth D. Laporte  
Judge Elizabeth D. Laporte  
NORTHERN DISTRICT OF CALIFORNIA

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HON. ELIZABETH D. LAPORTE  
MAGISTRATE JUDGE OF THE U.S. DISTRICT  
COURT, NORTHERN DISTRICT OF CALIFORNIA

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